

Exhibit A.

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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

**IN RE GOOGLE PLAY STORE
ANTITRUST LITIGATION**

THIS DOCUMENT RELATES TO:

Epic Games Inc. v. Google LLC et al., Case
No. 3:20-cv-05671-JD

*In re Google Play Consumer Antitrust
Litigation*, Case No. 3:20-cv-05761-JD

*In re Google Play Developer Antitrust
Litigation*, Case No. 3:20-cv-05792-JD

Case No. 3:21-md-02981-JD

**PLAINTIFFS' SUPPLEMENTAL
REQUEST FOR PRODUCTION OF
DOCUMENTS TO DEFENDANTS
GOOGLE LLC, GOOGLE IRELAND
LIMITED, GOOGLE COMMERCE
LIMITED, GOOGLE ASIA PACIFIC
PTE. LTD., and GOOGLE PAYMENT
CORP.**

Judge: Hon. James Donato

1 PROPOUNDING PARTY: EPIC GAMES, INC., ON BEHALF OF PLAINTIFFS

2 RESPONDING PARTY: GOOGLE LLC; GOOGLE IRELAND LIMITED;
3 GOOGLE COMMERCE LIMITED; GOOGLE ASIA
PACIFIC PTE. LTD.; and GOOGLE PAYMENT CORP.

4 SET NUMBER: TWO

5 Pursuant to Rule 34 of the Federal Rules of Civil Procedure, YOU are required to respond
6 within thirty (30) days of service hereof to the following request for production of DOCUMENTS, in
7 writing and under oath, and to produce the following DOCUMENTS in YOUR possession, custody
8 or control at the offices of Cravath, Swaine & Moore LLP, Worldwide Plaza, 825 Eighth Avenue,
9 New York, NY 10019, or at such other time and locations as may be mutually agreed upon by the
10 parties. In answering this request for production of DOCUMENTS (the “REQUEST”), YOU should
11 identify all DOCUMENTS within the possession, custody OR control of YOU AND/OR YOUR
12 representatives, accountants, attorneys, employees, officers OR other persons acting OR purporting
13 to act on YOUR behalf.

14 In responding to the REQUEST, YOU are required to produce all requested DOCUMENTS
15 that are in YOUR actual OR constructive possession, custody or control, OR in the actual OR
16 constructive possession, custody OR control of YOUR representatives, accountants, attorneys,
17 agents, employees, officers OR other person acting OR purporting to act on YOUR behalf.

18 PLAINTIFFS request that such production be made in accordance with the “DEFINITIONS”
19 and “INSTRUCTIONS” set forth in PLAINTIFFS’ First Set of Requests for Production of
20 Documents to Defendants Google LLC, Google Ireland Limited, Google Commerce Limited, Google
21 Asia Pacific Pte. Ltd. and Google Payment Corp., which are incorporated herein, and supplemented
22 below.

23 I. DEFINITION

24 “DISCOVERY MATERIALS” shall mean DOCUMENTS produced by YOU or received by
25 YOU as part of discovery, INCLUDING all: (i) DOCUMENTS produced by YOU or received by
26 YOU in response to any notice, request for production or subpoena duces tecum served pursuant to
27 N.Y. C.P.L.R. § R3120, or any similar discovery mechanism; (ii) responses to interrogatories served
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1 by or on YOU pursuant to N.Y. C.P.L.R. § 3132, or any similar discovery mechanism; (iii) responses
2 to requests for admission served by or on YOU pursuant to N.Y. C.P.L.R. § 3123, or any similar
3 discovery mechanism; and (iv) transcripts and videos of any deposition taken pursuant to a notice
4 served pursuant to N.Y. C.P.L.R. § 3107, or any similar discovery mechanism.

5 **II. DOCUMENT REQUEST**

6 **REQUEST FOR PRODUCTION NO. 204:**

7 Please produce all DISCOVERY MATERIALS in the case captioned *Callsome Solutions Inc.*
8 *v. Google, Inc.*, Index No. 652386/2014 (N.Y. Sup.).
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1 Dated: March 1, 2021

2 Respectfully submitted,

3 By /s/ Yonatan Even

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CERTIFICATE OF SERVICE

I hereby certify that on March 1, 2021, I served true and correct copies of Plaintiffs' Second Set of Requests for Production of Documents via electronic mail, pursuant to an agreement among the parties for electronic service, to the following counsel of record in this action and the related actions:

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1 I certify under penalty of perjury that the foregoing is true and correct. Executed on March 1,
2 2021, at Mineola, New York.

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4 /s/ Andrew Wiktor
5 Andrew Wiktor
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